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August 23, 2024

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Raw Story Media, Inc., et al. v. OpenAI, Inc. et al.*, Case No. 1:24-cv-01514-CM

Dear Judge McMahon:

The Parties respectfully and jointly request that the Court enter an order modifying and extending the case schedule (Dkt. No. 82), as reflected and requested in the table on the next page.

Good cause exists to modify and extend the case schedule due to ongoing discovery, including of voluminous training datasets that have posed unique challenges in production and review, which the Parties have worked diligently to resolve. The Parties also request that the Court add to the case schedule a “Substantial Completion of Fact Discovery” deadline, to ensure efficient and orderly progress in this case. Finally, the Parties request modest adjustments to the schedule to allot slightly more time between certain events (*e.g.*, opening expert reports and rebuttal expert reports), given the complexity of certain issues in this case.

The Parties have not previously requested an extension or modification of the case schedule.

The Parties appreciate the Court’s consideration of their joint request to modify and extend the case schedule.

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Scheduled Date	Original Date	Requested Modification and/or Extension
<i>Completion of Fact and Expert Discovery</i>	December 9, 2024	Substantial Completion of Fact Discovery: February 24, 2025
		Completion of Fact and Expert Discovery: May 22, 2025
<i>Opening Expert Reports</i>	October 18, 2024	March 24, 2025
<i>Rebuttal Expert Reports</i>	November 18, 2024	April 28, 2025
<i>MSJs & Daubert Motions</i>	January 23, 2025	June 16, 2025
<i>Oppositions to MSJs and Daubert Motions</i>	14 days after motions served	July 11, 2025
<i>Replies ISO of MSJs and Daubert Motions</i>	5 days after oppositions served	July 25, 2025
<i>Joint Pretrial Order</i>	January 23, 2025	August 6, 2025

Sincerely,

KEKER, VAN NEST & PETERS LLP

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/s/ Katie Lynn Joyce

Katie Lynn Joyce
 Counsel for Defendants

/s/ Matthew Topic

Matthew Topic
 Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC.,
ALTERNET MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI
GLOBAL LLC, OAI CORPORATION, LLC,
OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-01514-CM

Hon. Colleen McMahon

**[PROPOSED] REVISED SCHEDULING
ORDER**

Pursuant to the Parties' joint request to modify and extend the case schedule, and good cause appearing, it is hereby ordered that the case schedule is modified as reflected in the "New Deadline" column in the table below.

Scheduled Date	Original Deadline	New Deadline
<i>Completion of Fact and Expert Discovery</i>	December 9, 2024	Substantial Completion of Fact Discovery: February 24, 2025
		Completion of Fact and Expert Discovery: May 22, 2025
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<i>Joint Pretrial Order</i>	January 23, 2025	August 6, 2025

Entered this ____ day of August, 2024.

IT IS SO ORDERED.

The Honorable Colleen McMahon
UNITED STATES DISTRICT JUDGE